

**DECLARATION OF MARGARET A. MCLETCHIE**

I, MARGARET A. MCLETCHIE, declare, pursuant to Nev. Rev. Stat. § 53.330, as follows:

1. I have personal knowledge of the facts set forth below, and, if called as a witness, could testify to them. Where I do not have personal knowledge of certain facts, I make them under information and belief.

2. I am an attorney duly licensed to practice law in Nevada.

3. I am counsel for Proposed Intervenor, The New York Times Company (“The Times”), in the case of *Kathryn Mayorga v. Cristiano Ronaldo*, United States District Court Case No. 2:19-cv-00168-JAD-DJA.

4. The Times seeks to intervene in this matter and moves this Court to allow The Times to intervene for the limited purpose of opposing Defendant’s Motion for Protective Order and Plaintiff’s Motion for a Preliminary Injunction.

5. I am making this declaration to verify factual representations contained in the Motion to Intervene.

6. On December 15, 2021, I called Peter Christiansen, counsel for Defendant Ronaldo, to determine whether he would object to The Times’s intervening in this matter and to propose a schedule for briefing.

7. Mr. Christiansen indicated that he would oppose “anything and everything” from The Times because those were his marching orders from Defendant’s counsel in Europe.

8. I certify and declare under the penalty of perjury under the law of the State of Nevada that the foregoing is true and correct, and this declaration was executed at Las Vegas, Nevada, the 29<sup>th</sup> day of December, 2021.

/s/ Margaret A. McLetchie

Margaret A. McLetchie, NV Bar No. 10931